

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE: PACIFIC MARKET
INTERNATIONAL, LLC, STANLEY
TUMBLER LITIGATION

Master File No. 2:24-cv-00191-TL

**STIPULATED MOTION TO EXTEND
INITIAL CASE SCHEDULING
DEADLINES AND ~~PROPOSED~~
ORDER**

This Document Relates to: All Actions

NOTE ON MOTION CALENDAR:
MAY 24, 2024

Plaintiffs and Defendant Pacific Market International, LLC (“PMI”) submit this stipulated motion to extend the initial case scheduling deadlines, based on the following facts:

Whereas, on February 12, 2024, Plaintiff in the *Franzetti v. Pacific Market International LLC*, No. 2:24-cv-00191-TL action filed her Complaint (Dkt. No. 1) against PMI with the summons and Complaint served on February 14, 2024.

Whereas, on March 18, 2024, the Court set initial scheduling dates, to which the parties in *Franzetti* stipulated to extend while the Court considered the parties’ pending cross-motions in both that action and two related actions, with the initial meeting of counsel to commence no later than May 31, 2024, and with associated dates to follow for initial disclosures and submission of a Rule 26 conference report to the Court (Dkt. No. 26).

STIPULATED MOTION TO EXTEND INITIAL CASE
SCHEDULING DEADLINES AND ~~PROPOSED~~ ORDER
No. 2:24-cv-00191-TL

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Whereas, on April 26, 2024 and May 15, 2024, this Court consolidated *Krohn v. Pacific Market International, LLC*, No. 2:24-cv-00200-TL, *Barbu v. Pacific Market International, LLC*, No. 2:24-cv-00258-TL, and *Brown v. Pacific Market International, LLC*, No. 2:24-cv-00635-TL, with the Franzetti action, ordered plaintiffs to file a consolidated amended complaint by June 15, 2024, and vacated PMI's deadlines to respond to the underlying complaints in each of those respective cases and ordered PMI to respond to the operative Consolidated Amended Complaint 30 days after that Complaint had been filed (Dkt. No. 31; *Brown*, Dkt. No. 29).

Whereas, with plaintiffs preparing a consolidated amended pleading, the parties submit that it would conserve judicial and party resources to set a schedule that modifies the dates for initial scheduling in this action until a date after plaintiffs have filed the operative pleading and PMI has had an opportunity to respond to that pleading;

Accordingly, the parties stipulate to request the Court grant a motion that extends the initial case scheduling deadlines to the following dates:

- The deadline for Plaintiffs to file the Consolidated Amended Complaint be continued to June 18, 2024;
- The deadline for PMI to respond to the Consolidated Amended Complaint be continued to July 31, 2024;
- The deadline to hold the Fed. R. Civ. P. 26(f) conference be continued to August 7, 2024;
- The deadline to submit the Combined Joint Status Report and Discovery Plan as required by Fed. R. Civ. P. 26(f) and Local Civil Rule 26(f) continued to August 21, 2024;
- The deadline to exchange initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) continued to September 5, 2024; and

- If a motion to dismiss the Consolidated Amended Complaint is filed, the deadline for Plaintiffs to respond to that motion be set for August 29, 2024, and any reply submitted by PMI set for September 20, 2024, with the Court to schedule a hearing on such motion as it deems appropriate.

The parties reserve the right to seek further modifications to these deadlines.

DATED May 24, 2024

Respectfully submitted,

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SCHEDULING DEADLINES AND ~~PROPOSED~~ ORDER
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Dated: May 24, 2024

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I certify that this memorandum contains
465 words, in compliance with the Local
Civil Rules.

~~[PROPOSED]~~ ORDER

This matter is before the Court on the Parties' Stipulated Motion to Extend Initial Case Scheduling Deadlines. Having reviewed the relevant record and the stipulation of the parties, the Court GRANTS this Motion. The initial case scheduling deadlines shall be extended as follows:

- The deadline for Plaintiffs to file the Consolidated Amended Complaint be continued to June 18, 2024;
- The deadline for Defendant to respond to the Consolidated Amended Complaint be continued to July 31, 2024;
- The deadline to hold the Fed. R. Civ. P. 26(f) conference be continued to August 7, 2024;
- The deadline to submit the Combined Joint Status Report and Discovery Plan as required by Fed. R. Civ. P. 26(f) and Local Civil Rule 26(f) continued to August 21, 2024;
- The deadline to exchange initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) continued to September 5, 2024; and
- If a motion to dismiss the Consolidated Amended Complaint is filed, the deadline for Plaintiffs to respond to that motion be set for August 29, 2024, and any reply submitted by Defendant set for September 20, 2024, with the Court to schedule a hearing on such motion as it deems appropriate.

IT IS SO ORDERED.

Dated this 24th day of May 2024.



Tana Lin
United States District Judge

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